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10 Attorneys for Plaintiff
United States of America
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12 IN THE UNITED STATES DISTRICT COURT
13
EASTERN DISTRICT OF CALIFORNIA

14
15 UNITED STATES OF AMERICA,
16
Plaintiff,
17
v.
18 CHOON FOO YONG AKA KEITH YONG,
19
Defendant.

CASE NO. 2:22-CR-053 KJM
MOTION AND [PROPOSED] ORDER FOR
LIMITED DISCLOSURE OF SEARCH WARRANT
MATERIALS
COURT: Hon. Kimberly J. Mueller

20
21 Plaintiff United States of America, by and through its counsel of record, requests that the Court
22 allow the United States to produce in discovery in the above-captioned matter—and in pre-
23 indictment/pre-information discovery in any related matters—the following under-seal search warrants,
24 applications for search warrants, and accompanying affidavits:

- 25 • 2/5/2021: 2:21-sw-0089 CKD (Search of 2 email accounts—Oath Holdings)
26 • 2/5/2021: 2:21-sw-0090 CKD (Search of 7 emails accounts—Google)
27 • 5/21/2021: 2:21-sw-0439 CKD (Search of 1 email account—Google)
28 • 5/21/2021: 2:21-sw-0440 CKD (Search of 1 email account—Oath Holdings)

- 10/20/2021: 2:21-sw-0806 CKD (Search of 11892 E. Princeton Avenue)

These documents discuss an ongoing criminal investigation that may not be known to all of the targets of the investigation. Accordingly, there is good cause to keep them sealed on the docket at this time.

Dated: June 3, 2022

PHILLIP A. TALBERT
United States Attorney

/s/ LEE S. BICKLEY
LEE S. BICKLEY
Assistant United States Attorney

[PROPOSED] ORDER

IT IS SO FOUND AND ORDERED this ____ day of _____, ____.

**THE HONORABLE Kimberly J. Mueller
UNITED STATES DISTRICT JUDGE**